

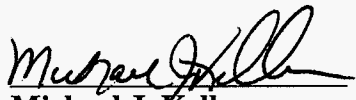
**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

**CERTIFICATION OF CPNI FILING FEBRUARY 6, 2006 OF
E-COM TECHNOLOGIES, LLC., DBA FIRSTMILE TECHNOLOGIES**

EB-06-TC-060 / WC DOCKET NO. 06-36

Pursuant to the recent Public Notice¹ issued by the Enforcement Bureau asking all telecommunications carriers to file with the Commission by February 6, 2006 the customer proprietary network information ("CPNI") compliance certificates required under section 64.2009(e) of the Commission's rules, E-Com Technologies, LLC dba FirstMile Technologies hereby submits the following certificate and statement.

I, **Michael J. Keller**, an officer of E-Com Technologies, LLC dba FirstMile Technologies ("FirstMile"), hereby certify that I have personal knowledge that FirstMile has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules, found at 47 C.F.R. Pt. 64, Subpt. U. Attached to this certificate is a statement explaining how the operating procedures of FirstMile ensure that it is in compliance with the Commission's CPNI rules.


Michael J. Keller
Chief Financial Officer
E-COM TECHNOLOGIES, LLC.,
DBA FIRSTMILE TECHNOLOGIES

¹ Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications, Public Notice, DA 06-223 (EB rel. Jan. 30, 2006).

**STATEMENT CONCERNING PROCEDURES ENSURING
COMPLIANCE WITH CPNI REGULATIONS**

The operating procedures and practices of E-Com Technologies, LLC (dba FirstMile and dba FirstMile Technologies) ("FirstMile") and all affiliated entities ensure that FirstMile complies with the Commission's rules at 47 C.F.R. § 64.2001, *et. seq.*, governing the use of customer proprietary network information ("CPNI").² Compliance with such rules is demonstrated by the policies, practices, training and supervisory practices employed by FirstMile and its affiliates. Following is a brief explanation of the procedures FirstMile and its affiliates employ.

Neither FirstMile nor its affiliates currently use any CPNI to market, either to existing or prospective customers. Should FirstMile or any of its affiliates decide to expand their marketing efforts to include CPNI in future marketing efforts, they would implement a system to clearly establish the status of a customer's CPNI approval prior to any use of, disclosure of, or permitting access to its customers' CPNI.

Second, FirstMile does not disclose or permit access to CPNI by third parties except as may be required by law (such as when CPNI is requested pursuant to a valid subpoena, court order, search warrant or national security letter) or as is necessary for the provision of FirstMile's local and long distance service themselves. FirstMile does not use third parties to market its services.

Third, FirstMile employs a variety of operating procedures to ensure compliance with CPNI regulations. Such procedures include:

1. FirstMile and its affiliates have corporate privacy policies in their employee manuals that instruct employees who conduct marketing efforts on the proper

² Only E.Com Technologies LLC is a telecommunications carrier. None of its affiliates are carriers.

handling of confidential customer information. FirstMile's general manager, who supervises all handling of confidential FirstMile customer information, receives on-going training in the federal, state and local legal requirements governing the use and disclosure of customers' confidential information.

2. FirstMile and its affiliates have disciplinary programs to ensure compliance with their operating procedures, including procedures for handling customer confidential information. Its disciplinary program includes a variety of penalties for the violation of privacy procedures, including the termination of employment where appropriate.

3. Neither FirstMile nor any of its affiliates has used any CPNI in any marketing effort to date, and all marketing campaigns, including outbound marketing campaigns, are preapproved by supervisory employees. Moreover, neither FirstMile nor any of its affiliates have released any CPNI to any third parties to date, but would maintain a record of any authorized release of customer CPNI to third parties (such a release occurring pursuant to a valid subpoena). FirstMile and its affiliates would maintain a record of any future marketing effort involving CPNI or any future authorized release of CPNI for at least one year.